

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
:
Denise Robin Marshall : No. 21-11658-AMC
Debtor :

OBJECTION TO CERTIFICATE OF DEFAULT AND REQUEST FOR A HEARING

The Debtor, Denise Robin Marshall, by her Attorney hereby objects to the Certificate of Default filed in this case and requests a hearing in this matter and in support of the same avers as follows;

1. The Debtor had set up her account to pay the mortgage and to come out of her account. The money has not been taken out and is still in the account.

WHEREFORE, the Debtor respectfully requests that this Honorable Court not enter a relief order.

Dated: 01/10/2022

/s/ David M. Offen
David M. Offen
Attorney for Debtor(s)
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A copy of this Objection is being served on Kaitlin D. Shire, Esquire and the Chapter 13 Trustee.